

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

TARENCE BANKS,

Plaintiff,

Case No. 14-CV-0381

vs.

NURSE LESLIE, UNKNOWN,
NURSE BILL, NURSE MEHRING,
CHRISTOPHER SCHMALING, NICK KOLDEWAY,
PATRICK NOONAN, MELISSA A. GONZALES,
SGT. MELISSA MORAN, LT. SHAWN BARKER,
LT. BRADLEY FRIEND, UNKNOWN,
DOUGLAS WEARING, and PORFIRIO LEDEZMA,

Defendants.

AFFIDAVIT OF DOUGLAS WEARING IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT

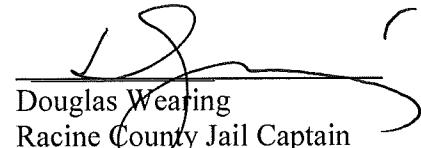
State of Wisconsin)
)ss.
Milwaukee County)

Douglas Wearing, being first duly sworn, on oath deposes and states as follows:

1. Affiant is, and was at all times relevant to the above-captioned lawsuit, a Racine County Sheriff's Office Captain charged with the duty to oversee and manage all Racine County Jail operations.
2. As Jail Captain, Douglas Wearing has personal knowledge of the facts of this lawsuit having engaged in his own personal investigation into the allegations when the Plaintiff's Summons and Complaint were first served on the Defendants to this action.
3. Captain Wearing has personal knowledge of all Racine County Jail policies and procedures during all times relevant to this lawsuit.
4. Attached hereto and incorporated herein as Exhibit A is a true and correct copy of the Plaintiff's Jail File.

5. Attached hereto and incorporated herein as Exhibit B is a true and correct copy of select documents from the Plaintiff's Jail Medical File.
6. Attached hereto and incorporated herein as Exhibit C is a true and correct copy of the Racine County Jail Handbook in force an effect from the time of Plaintiff's incarceration on November 12, 2013 until October 30, 2014.
7. Attached hereto and incorporated herein as Exhibit D is a true and correct copy of select portions of the Racine County Jail Roll Call.
8. The Plaintiff was transferred from Racine County Jail to Dodge Correctional Institute on January 21, 2015.

Dated this 3rd day of February, 2015.



Douglas Wearing
Racine County Jail Captain
Defendant

Subscribed and sworn to before me this 3rd day of February, 2015.



Cynthia J. Cuesta

Notary Public, State of Wisconsin
My commission expires: 1/24/16